

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
KANSAS CITY**

THERESA HILL, on behalf of herself and those  
similarly situated,

Plaintiff,

v.

LEXISNEXIS RISK SOLUTIONS INC.,

Defendant.

Case Number: 4:18-cv-00560-RK

ORAL ARGUMENT REQUESTED

**PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

Plaintiff, Theresa Hill, through her undersigned counsel, hereby moves for certification of this action as a class action pursuant to Fed. R. Civ. P. 23 Fed. R. Civ. P. 23(b)(3) or, in the alternative, an issues class certified under Fed. R. Civ. P. 23(c)(4), for the reasons set forth in the Suggestions in Support of Plaintiff's Motion for Class Certification ("Suggestions") simultaneously filed herewith.

WHEREFORE, Plaintiff prays for an Order (1) certifying the class defined in her First Amended Complaint (Doc. 16) ¶ 45 or, in the alternative, the Issues Class set forth in her Suggestions, (2) appointing Plaintiff as representative of the Class and her undersigned counsel as class counsel, and (3) granting such other and further relief as the Court deems just and appropriate.

February 12, 2021

Respectfully submitted,

s/ William M. Sweetnam  
Keith J. Keogh, *pro hac vice*  
William M. Sweetnam, *pro hac vice*  
KEOGH LAW, LTD  
55 West Monroe Street, Suite 3390  
Chicago, Illinois 60603  
312-726-1092  
keith@keoghlaw.com  
wsweetnam@keoghlaw.com

s/ Matthew S. Robertson  
A.J. Stecklein #46663  
Michael Rapp #66688  
Matthew S. Robertson #70442  
STECKLEIN & RAPP, CHTD.  
748 Ann Avenue  
Kansas City, Kansas 66101  
(913) 371-0727  
aj@kcconsumerlawyer.com  
mr@kcconsumerlawyer.com  
msr@kcconsumerlawyer.com

*Attorneys for Plaintiff and the Class*

**CERTIFICATE OF FILING**

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of the Court's CM/ECF system on this February 12, 2021, which will automatically generate notice to all counsel of record.

s/ Matthew S. Robertson